

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHESTER TSANG, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LDK SOLAR CO., LTD., XIAOFENG  
PENG, XINGXUE TONG, LIANGBAO  
ZHU, YONGGANG SHAO, GANG WANG,  
JACK LAI, and QUQUANG YAO,

Defendants.

No. 1:07-cv-08706 (JGK)

WEICHEN G. LUI, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LDK SOLAR CO., LTD., XIAOFENG  
PENG, XINGXUE TONG, LIANGBAO,  
YONGGANG SHAO, GANG WANG,  
LOUIS T. HSIEH, JACK LAI, NICOLA  
SARNO, YUEPENG WAN, RONQIANG  
CUI, PIETRO ROSSETTO, and QIQANG  
YAO,

Defendants.

No. 1:07-cv-08766 (JGK)

ISMAEL HALIDOU, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LDK SOLAR CO., LTD., XIAOFENG  
PENG, XINGXUE TONG, LIANGBAO  
ZHU, YONGGANG SHAO, GANG WANG,  
LOUIS T. HSIEH, JACK LAI, NICOLA  
SARNO, YUEPENG WAN, and QIQANG  
YAO,

Defendants.

No. 1:07-cv-09745 (JGK)

**DECLARATION OF MATTHEW B. KAPLAN**

1. I am an associate with the firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C. and an attorney for Movant Shahpour Javidzad.

2. Attached as Exhibit A to this Declaration is a true and correct copy of the press release that was the first notice to the class that this litigation had been filed in the Southern District of New York.
3. Attached as Exhibit B to this Declaration is a true and correct copy of a "Certification of Plaintiff Pursuant to Federal Securities Laws" executed by Movant.
4. Attached as Exhibit C to this Declaration is a true and correct copy of the Firm Resume of Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
5. Attached as Exhibit D to this Declaration are charts which I prepared which documents Movants' losses on LDK Solar Co., Ltd. securities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 10, 2007

/s/ Matthew B. Kaplan  
Matthew B. Kaplan